ADDLESHAW GODDARD

PRIVACY NOTICE: AG INTEGRATE

The purpose of this notice is to provide you, our AG Integrate consultants/prospective consultants, with helpful information in relation to how we process your personal data. If you have any questions, or if you want any further information, you can contact us using the details below.

WHAT TYPES OF DATA DO WE PROCESS?

As part of your application to become an AG Integrate consultant, we will process a range of information about you, including information about your background and experience, your contact details, your areas of interest and career aspirations, your business and company affiliations, and information from your referees. As we progress your application, we will also process information connected with our pre-engagement screening, including in relation to your right to work, identity/identification documents, and the results of our criminal record checks.

If you become an AG Integrate consultant, we will process further information relating to, for example, the assignments you are appointed to, the feedback we receive from clients about you, administrative and financial information including in respect of the time you spend on an assignment and sharing new assignments with you.

In some circumstances we may process special categories of personal data about you, in which case we take particular care to only process such data in accordance with the strict legal parameters. The nature of such information will vary, but would typically be limited to information about your health, in circumstances where you are absent from an assignment for health reasons, where you have let us know about reasonable adjustments you require, or where you provide dietary information in relation to any meetings.

COLLECTION OF YOUR PERSONAL DATA

We may obtain personal data from you directly from third parties, including your personal service company or other employer, your referees, third parties we engage to carry out pre-engagement checks, clients in relation to your assignments or prospective assignments.

WHAT DO WE DO WITH YOUR DATA?

We process personal data about you in connection with your application to become an AG Integrate consultant and, if successful, your role as an AGI consultant, as well as the pursuit of our business objectives. This may include:

- carrying out background checks;
- considering your application to become an AG Integrate consultant and for prospective assignments (including in discussions with clients);
- disclosures to our auditors, our own legal and other professional advisors, our insurers and insurance brokers;
- administering our clients' accounts with us;
- managing our business performance, assessing client satisfaction, conducting specific tests on our existing or new systems, networks, applications or software, and general improvement of our services;
- advertising, marketing and public relations, including sending you direct marketing communications (insofar as we are permitted by law).

WHAT BASIS DO WE HAVE FOR PROCESSING YOUR DATA?

We will only process your personal data where we have a lawful basis for doing so. In general, our lawful basis will be one of more of the following:

- that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering a contract;
- that the processing is necessary for compliance with our legal obligations;
- that the processing is necessary for the purposes of pursuing our, or a third party's, legitimate interests (this includes carrying out the business of providing legal services, the AG Integrate function and pursuing our general business interests);
- that the processing is necessary for the establishment, exercise or defence of legal claims;
- that the processing is necessary for reasons of substantial public interest.

In addition, in some circumstances we may process personal data on the basis that you have provided your consent, for example, through providing the information to us (including, in some instances, in respect of special categories of personal data). Please note that you have the right to withdraw any such consent, which you can do by getting in touch with us using the contact details below.

WHO DO WE SHARE YOUR DATA WITH?

In the operation of AG Integrate and as part of complying with our legal obligations, we may share the personal data that we obtain about you, insofar as we are permitted by law to do so, with the following third parties:

- members of the AG Group (see definition below);
- our clients (please note that, when on assignment, you should refer to the privacy notice issued by the client in relation to their use of your data – if your assignment is with us please see the AG Staff Privacy Policy);
- suppliers and service providers used by us in providing services, details of which can be made available on request, including (without limitation) postal services, document storage facilities, front of house teams and IT service providers such as cloud providers of software as a service, data room providers and providers of our IT servers. Please note, in particular, we use Bullhorn International, which is an applicant tracking system. Note that in limited circumstances, data on Bullhorn may be processed outside the EEA, in accordance with appropriate protections under GDPR;
- financial organisations, debt collection, credit reference and tracing agencies;
- our auditors, our own legal and other professional advisors, our insurers and insurance brokers;
- government agencies, regulators and other authorities (including (without limitation) the Information Commissioner and Ombudsmen); and
- our and your trade associations, professional bodies and business associates.

HOW LONG DO WE KEEP YOUR DATA?

We keep personal data in accordance with our internal retention procedures, which are determined in accordance with our regulatory obligations and good practice. These retention periods depend on the nature of the information (for example, we will keep information relating to your assignments in accordance with our client file retention procedures, which prescribe longer retention periods than for our personnel files). These are subject to change.

In relation to information obtained as part of your application, please note that, in general:

- for unsuccessful candidates, your application form, CV and interview notes, including any information relating to criminal convictions, will be retained for a maximum period of 6 months after the completion of the process;
- for successful candidates, we will retain your application form, CV and interview notes for as long as required during the course of your engagement, and up to 7 years after our relationship has ended.

If you have any questions in this regard, or any concerns about how long we keep your information for, please contact us using the details below.

DIRECT MARKETING

We may use your contact details to send you marketing materials, provided we are permitted to do so by law. You always have the right to unsubscribe from any marketing. You can do so by clicking on the relevant link in the next email we send you, or by contacting us directly using the details below.

Please see the Cookies Policy on our website for further details in relation to the cookies that are used as part of our marketing.

WHO ARE WE?

The AG Group operates worldwide and as a result your personal data may be processed by the AG Group in third countries. We have data transfer agreements (with model clauses) in place as a safeguard in respect of any such processing, copies of which are available on request.

Personal data may be processed by members of the AG Group. The AG Group consists of Addleshaw Goddard LLP and any entities owned or controlled by Addleshaw Goddard LLP or any of its partners, or owned or controlled by any other AG entity or any of such AG entity's partners, including Addleshaw Goddard (GCC) LLP, Addleshaw Goddard (Hong Kong) LLP, Addleshaw Goddard (Middle East) LLP and Nasser Al Habsi & Saif Mamari Law Firm.

WHAT ARE YOUR RIGHTS?

You have the right to lodge a complaint with the Information Commissioner in respect of our processing of your personal data. Information can be found at <u>www.ICO.org.uk</u>. If you would like to raise your complaint with us in the first instance, please follow the <u>Complaints Procedure</u> on our website (a hard copy is available on request).

You have rights under data protection laws to request from us access to, rectification of, or erasure of your personal data. You also have the right to request the restriction of any processing or to object to our processing of your personal data. Finally, you have the right to data portability. Please use the contact details below to exercise your rights. You can find more information about your rights at <u>www.ICO.org.uk</u>.

HOW CAN YOU CONTACT US?

You can contact the AG Integrate team with any queries about the above, by emailing us at AG.Integrate@addleshawgoddard.com.

More generally, you can get in touch with us in respect of any of the members of the AG Group, and in relation to any data protection queries, by emailing us at <u>DataProtection@addleshawgoddard.com</u> or <u>DataProtection@aglaw.com</u> (for our non-UK offices).

You can also write to our GC & Risk team (who have general oversight of our compliance with data protection laws), at Addleshaw Goddard LLP, Milton Gate, 60 Chiswell St, London EC1Y 4AG

addleshawgoddard.com

Aberdeen, Doha, Dubai, Edinburgh, Glasgow, Hamburg, Hong Kong, Leeds, London, Manchester, Muscat, Singapore and Tokyo*

*a formal alliance with Hashidate Law Office

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